Model Water Efficient Landscape Ordinance

Dear Julie,

Upon review of the MWELO draft revisions I have the following comments:

1. **Section 492.6 (a)(3) Soil Preparation, Mulch and Amendments** states that "Prior to the planting of any materials, compacted soils shall be transformed to a friable condition." How is a "friable condition" achieved on engineered freeway slopes? Is it safe to require "friable" soils in all planted areas – even adjacent to highways and freeways? How is a friable condition different than the current standard practice of planting a tree, plant, or groundcover in an amended plant hole?
2. **Irrigation Efficiency definition** states that the "minimum average irrigation efficiency for purposes of this ordinance is .85 for residential areas and .92 for non-residential areas, averaged on a site-wide basis." Is this even achievable with existing irrigation equipment? Is the intent of this modification intended to eliminate ALL forms of overhead spray? Does the irrigation industry have the ability to produce irrigation equipment that could reasonably meet the proposed efficiency requirements?
3. The **MAWA and ETWU** calculations do nothing to encourage conservation of recycled water. In 100% recycled water conditions, the MAWA and ETWU calculation looks like this: (ETo)(0.62)(SLA). There is no consideration for a plant factor, nor an irrigation efficiency. Since the ordinance is encouraging use of recycled water, it is logical to conclude that the demand for recycled water will increase and also require conservation measures be implemented.
4. **The Soil Preparation, Mulch and Amendments** section requires that all soils be amended "appropriate for the plants selected." A more sustainable approach would be to require selection of plant material that would thrive in the existing soil conditions. The use of California native or California friendly Mediterranean plant materials would satisfy this requirements in most situations.
5. **The Soil Preparation, Mulch and Amendments** requirement to apply organic mulch "on all exposed soils surfaces of planting areas" is an inappropriate blanket requirnment. There are many instances where non-organic, inert (rock) mulch materials are preferred and well suited over mulch. A quality decorative rock mulch material looks as good as organic (bark) mulch materials, has a much longer life, lower maintenance requirements, and will not start or contribute to the spread of wildfires. A large percentage of homes in Riverside and San Bernardino counties have used rock mulch for years, specifically due to its longer life and fire suppression abilities. We recommend leaving the selection of proper mulch materials up to the homeowner or landscape professional.

Thank you,

Camilo Arellano Jr.
Landscape Associate, CLIA
HQ- Div. of Design
Landscape Architecture Program

and

Jack Broadbent, PLA 3404
Office Chief
Landscape Architectural Standards and Procedures